

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re: Melvin Taylor) Chapter 13
)
) No. 21-05466
)
Debtor(s)) Judge Jacqueline Cox

NOTICE OF MOTION

TO: See attached list

PLEASE TAKE NOTICE that on March 6, 2023, at 10:00 am, I will appear before the Honorable Jacqueline Cox, or any judge sitting in that judge's place, **either** in courtroom 680 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present the motion of Debtor [to/for] Modify Plan, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 273 2896, and the passcode is 778135. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

By: David Freydin

Attorney for Debtor
Law Offices of David Freydin
8707 Skokie Blvd, Suite 312
Skokie, Illinois 60077
847.972.6157

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CERTIFICATE OF SERVICE

I, David Freydin, certify [if an attorney]/declare under penalty of perjury under the laws of the United States of America [if a non-attorney] that I served a copy of this notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on February 6, 2023, at 5:00 pm.

/s/ David Freydin

[Signature]

CERTIFICATE OF SERVICE

I hereby certify that in this 6th day of February, 2023, I placed a true and correct copy of the foregoing DEBTOR'S MOTION TO MODIFY PLAN., in the U.S. Mail, first-class, postage prepaid, addressed to the following parties:

Pennymac Loan Services
PO Box 514387
Los Angeles, CA 90051

Timothy R. Yueill, Attorney for Pennymac Loan Services
Law Offices of Ira T. Nevel
175 N. Franklin St., Suite 201
Chicago, IL 60606

University of Kentucky FCU
1730 Alysheba Way
Lexington, KY 40509

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541

/s/ David Freydin
David Freydin

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 IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE NORTHERN DISTRICT OF ILLINOIS

In the Matter of:

Melvin Taylor

Debtor(s)
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Case No. 21-05466

Chapter 13

Judge Jacqueline P. Cox

DEBTOR'S MOTION TO MODIFY PLAN

NOW COMES THE DEBTOR by and through his attorney, David Freydin, and requests that this Honorable Court modify the Chapter 13 Plan under Section 1329 for the reasons below, and in support thereof, states as follows:

1. That the Debtor filed a Chapter 13 bankruptcy petition in the Northern District of Illinois, Eastern Division as case number 21-05466 on April 27, 2021.
2. That this Honorable Court confirmed the Debtor's Chapter 13 Plan on August 23, 2022, with general, unsecured creditors to be paid 55.39% of their allowed claims.
3. That the Debtor's confirmed plan requires him to pay \$660.00 per month for 60 months.
4. That around the end of 2022, the Debtor's son had lost his job and was in need of the Debtor's financial support.
5. That the Debtor fell behind because he was supporting his son financially, along with his own monthly living expenses.
6. That the Debtor's son is now gainfully employed and no longer requires the Debtor's support.
7. That the Debtor can maintain payments, but not get fully caught up.
8. That the Debtor asks this Honorable Court to defer the current default so that he may successfully complete his Chapter 13 case.

9. That the Debtor further asks this Honorable Court to increase his Chapter 13 Plan payments to \$733.00 per month for the remainder of the case so that the plan remains feasible. In addition, the Debtor requests that the set payment to the University of Kentucky FCU be increased in section 3.2 of the plan from \$158.39 to \$600.00, to reduce the amount of interest to be paid to this secured creditor and allow the plan to remain feasible.

WHEREFORE THE MOVANT PRAYS that this Honorable Court enter an order modifying the Chapter 13 plan to:

- A. Defer the current default;
- B. Increase his payments to \$733.00 per month;
- C. Increase the set payment in Section 3.2 from \$158.39 to \$600.00;
- D. And, for such other and further relief this Court deems just and proper.

/s/ David Freydin
David Freydin
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